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VIA ELECTRONIC CASE FILING

October 1, 2024

The Honorable Elizabeth S. Stong
United States Bankruptcy Judge
United States Bankruptcy Court
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: In re: Hui Qin a/ka/ Muk Lam Li, Karl Qin
Chapter 7 Debtor
Case No.: 24-41955-ess

Dear Judge Stong:

We are counsel to Richard J. McCord, Esq. (the "Trustee"), the chapter 7 trustee for the estate of Hui Qin. This letter is in follow up to the Scheduling Order entered by the Court on Monday, September 30, 2024 [ECF Doc. No. 73] (the "Order").

We write to let you know that we had and will have difficulty complying with that part of the Order requiring service on creditors for whom we do not have an e-mail address. The Order requires service to be by overnight mail to be received by October 1, 2024. There are 16 parties in interest on the creditor mailing matrix for which we do not have the e-mail addresses, and none was ever supplied by the Debtor. The issue that raises is that all 16 parties have addresses in China or Chinese territories. We have been advised that overnight delivery to those locations is not possible. Additionally, when we try and process the mailings on an expedited delivery, the cost for each mailing is in excess of \$100 per package. The Debtor's estate currently has no money in it. As such, on behalf of the Trustee, we request an amendment to the Order that will permit us to serve those creditors by first class international mail through the United States Postal Service.

If Your Honor should have any questions or require additional information, please do not hesitate to have a member of chambers contact us.

Thank you.

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Respectfully,

/s/ Robert D. Nosek
ROBERT D. NOSEK

RDN:ccf

cc: Richard J. McCord, Esq.